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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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 IN RE: BEACON ASSOCIATES LITIGATION :

Master File No.:

09 Civ. 0777 (LBS)

This Document Relates To:
 ALL ACTIONS

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STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING TIME TO RESPOND TO CROSS-CLAIMS

WHEREAS, on December 20, 2010, nominal defendants Beacon Associates LLC I and Beacon Associates LLC II (collectively, the "Beacon Fund") filed their answer and counterclaims to the plaintiffs' second amended class action and derivative complaint in the above-captioned action; and

WHEREAS, in its answer, the Beacon Fund asserted cross-claims against, *inter alia*, the defendants Beacon Associates Management Corp., Joel Danziger and Harris Markhoff (collectively, the "Management Defendants"); and

WHEREAS, the Management Defendants' response to the Beacon Fund's cross-claims was to be filed on or before March 25, 2011;

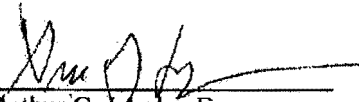
NOW, THEREFORE, the undersigned parties hereby STIPULATE AND AGREE as follows:

1. The date by which the Management Defendants shall file and serve their answer or response to the cross-claims of the Beacon Fund shall be on or before April 8, 2011;

2. This Stipulation may be executed in counterparts, and electronic or facsimile signatures shall be deemed to be original signatures.


Respectfully submitted,

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*Attorneys for Defendants Beacon
Associates Management Corp., Joel
Danziger and Harris Markhoff*

Dated: March 25, 2011

SO ORDERED:


Hon. Andrew J. Peck
United States Magistrate Judge